

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No. 1:22-CV-00084**

Carl A. B., et al.,

Plaintiffs,

v.

**Blue Cross and Blue Shield of North
Carolina, and Blue Options PPO**

Defendants.

Motion for Extension of Time

NOW COME Plaintiffs, by and through the undersigned counsel and pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Rule 7.3, and move the Court to extend the deadline for filing Objections to the Magistrate Judge's Memorandum, Opinion, and Recommendation from September 3, 2024 to September 17, 2024.

1. On August 19, 2024, the Hon. Magistrate Judge Peake entered a Memorandum Opinion and Recommendation (the "Recommendation"). (Doc. 135.)

2. That same day, the Deputy Clerk entered Notice that Objections to the Magistrate Judge's Recommendation must be filed and served by Tuesday, September 3, 2024 for parties such as the Plaintiff, who received the Notice by means of CM/ECF. (Doc. 136.)

3. Counsel for Plaintiffs, Kelly Noyes, is currently traveling and without reliable internet access through Monday, August 26, 2024.

4. Plaintiffs request additional time for good cause and not for the purpose of delay, so that Plaintiffs' Counsel can adequately respond to the Magistrate's Recommendation.

5. Counsel for Plaintiffs has consulted with Counsel for Defendant, who consents to this Motion.

6. A proposed Order will be submitted herewith.

THEREFORE, Plaintiffs respectfully request the Court extend the deadline for filing Objections to the Magistrate Judge's Memorandum, Opinion, and Recommendation from September 3, 2024 to September 17, 2024.

This, the 21st day of August, 2024

HULL & CHANDLER

By: /s/ Elizabeth Venum
Elizabeth Venum
N.C. State Bar No. 49747
Hull & Chandler
1009 East Boulevard
Charlotte, NC 28203
Tel. (704) 375-8488
Fax (704) 375-8487
lvennum@lawyercarolina.com
Counsel for Plaintiffs

Certificate of Service

This is to certify that on this date the undersigned filed the foregoing electronically using the Court's CM/ECF system which will send notification of such filing to all counsel of record.

This the 21st day of August, 2024.

Hull & Chandler

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Counsel for Plaintiffs